

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CAPREF LLOYD CENTER EAST, LLC¹

Debtor.

Chapter 11

Case No. 23-11942 (JTD)

Initial Hearing Date and Time:
March 19, 2024 @ 10:00 am (ET)
(Bidding Procedures Only)

Objection Deadline:
March 12, 2024 @ 4:00 pm (ET)
(Bidding Procedures Only)

NOTICE OF MOTION FOR ENTRY OF (I) AN ORDER (A) APPROVING BIDDING PROCEDURES FOR THE SALE OF SUBSTANTIALLY ALL OF THE DEBTOR'S ASSETS; (B) SCHEDULING AN AUCTION AND SALE HEARING AND APPROVING THE FORM AND MANNER OF NOTICE THEREOF; AND (C) GRANTING RELATED RELIEF; AND (II) AN ORDER (A) APPROVING THE SALE OF SUBSTANTIALLY ALL OF THE DEBTOR'S ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES AND (B) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that on February 27, 2024, the above-captioned debtor and debtor-in possession (the “Debtor”), filed the *Motion for Entry of (I) an Order (A) Approving Bidding Procedures for the Sale of Substantially All of the Debtor's Assets; (B) Scheduling an Auction and Sale Hearing and Approving the Form and Manner of Notice Thereof; and (C) Granting Related Relief; and (II) an Order (A) Approving the Sale of Substantially All of the Debtor's Assets Free and Clear of All Liens, Claims, Interests and Encumbrances and (B) Granting Related Relief* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of Practice and Procedure for the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court, and served upon, so as to be received by, the undersigned counsel on or before **March 12, 2024 at 4:00 p.m. (ET)**. Only properly and timely filed responses will be considered.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion is scheduled for **March 19, 2024 at 10:00 a.m. (ET)** before the Honorable John T. Dorsey, United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

¹ The Debtor in this case, along with the last four digits of its federal tax identification number, is CAPREF Lloyd Center East, LLC (1920) and the location of its service address is 4514 Travis Street, Suite 208, Dallas, TX 75205.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 27, 2024
Wilmington, Delaware

ASHBY & GEDDES, P.A.

/s/ Gregory A. Taylor

Gregory A. Taylor (No. 4008)
Michael D. DeBaecke (No. 3186)
500 Delaware Avenue, 8th Floor
Wilmington, DE 19801
Phone: (302) 654-1888
Email: GTaylor@ashbygeddes.com
MDeBaecke@ashbygeddes.com

Counsel for the Debtor and Debtor in Possession